

From: Fisher, Carla
To: susanh@ida.net
Cc: [Kelly Wright](#); [Virginia Monsisco](#)
Subject: RE: RCRA Ponds
Date: Wednesday, September 04, 2013 3:25:00 PM

I think there would be problems with trying to determine compliance with and/or enforce a requirement like this. The National Weather Service tracks rainfall on a 24-hour basis, not hourly. There would also be issues about determining what values were needed to be protective of the cap integrity. Typically, 100-year storm events are used for TSDFs. I haven't had a chance to go back and research in the files, but presumably, we made a determination when we approved the post-closure plans that a 25-year, 24-hour storm event was protective.

Barbara returned my call this afternoon and said that she was going to check with her folks and get back to me tomorrow or Friday to let me know whether an inspection is do-able. They usually do their inspections in October.

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From: Susan Hanson [<mailto:susanh@ida.net>]
Sent: Wednesday, September 04, 2013 2:44 PM
To: Fisher, Carla
Cc: [Kelly Wright](#); [Virginia Monsisco](#)
Subject: Re: RCRA Ponds

kelly, carla

perhaps we should consider an amendment to the o&m plan for the ponds to include inspections when x inches of rain falls within x timeframe. While the 25 year year, 24 hour storm event is also necessary these last storms necessitate inspections when we get more than half the annual average rainfall within hours.

I would propose leachate collection system inspections and cap cover inspections within 24 hours of a storm event such as whe 4 inches falls within a 5 hour time period or something similar.

On Sep 4, 2013, at 2:30 PM, "Fisher, Carla" <Fisher.Carla@epa.gov> wrote:

I left a voicemail for Barbara. Hopefully, she'll get it in a timely manner.

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From: Susan Hanson [mailto:susanh@ida.net]
Sent: Tuesday, September 03, 2013 8:06 PM
To: Fisher, Carla
Cc: Weigel, Greg; Kelly Wright; Virginia Monsisco
Subject: Re: RCRA Ponds

Carla

Thank you for checking. Can we request EPA ask fmc for an inspection? Again today we have received an unusual amount of rain with a lot of flooding.

Susan Hanson

On Sep 3, 2013, at 1:36 PM, "Fisher, Carla" <Fisher.Carla@epa.gov> wrote:

I checked the current (2003) Pond 16S post-closure plan. Section 10.3 of the plan requires inspection of the cap and leak detection system within 48 hours of a 25-year, 24-hour storm event. Section 10.7 requires inspection of the storm water management system within 48 hours of a 25-year, 24-hour storm event.

The draft post-closure plan modification describes a 25-year, 24-hour event as 2.1 inches of rain in 24 hours. According to the National Weather Service website, the precipitation for 8/ 23 was 0.04 inches and the precipitation for 8/28 was 0.11 inches. So inspections would not have been required.

I have not yet checked the other post-closure plans, but I assume the language is similar.

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From: Susan Hanson [<mailto:susanh@ida.net>]
Sent: Thursday, August 29, 2013 7:54 PM
To: Weigel, Greg
Cc: Fisher, Carla; Kelly Wright; Virginia Monsisco
Subject: Re: RCRA Ponds

Ok. I will check with Carla. The Post Closure Plans are not approved. Seems the O&M provisions of both should cover but these were unusual events with a 1/4 of Pocatello's rainfall within hours.

Susan

On Aug 29, 2013, at 2:15 PM, "Weigel, Greg" <Weigel.Greg@epa.gov> wrote:

Susan,

I believe that cap inspection and leachate collection would be covered under the post closure plan and not the UAO. I'll defer to Carla for response to your questions.
Thanks,

Greg Weigel
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EPA Region 10, Emergency Response Unit
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208-867-3710 cell

From: Susan Hanson [<mailto:susanh@ida.net>]
Sent: Thursday, August 29, 2013 1:33 PM
To: Weigel, Greg
Cc: Fisher, Carla; Smith, Andy; Kelly Wright; brian.english@deq.idaho.gov; Rochlin, Kevin; vannoyj@dhw.idaho.gov; Paden, Norka E - CO 6th
Subject: Re: RCRA Ponds

Greg,

On August 23 and again on August 28 the Pocatello area had a significant amount of rain. Did FMC conduct any inspections following these events? The Tribes request information whether either of these events impacted the caps, if excess water was identified in the leachate collection systems or if another impacts have been identified.

Susan Hanson

On Aug 28, 2013, at 12:40 PM, Barbara Ritchie
<BARBARA.RITCHIE@fmc.com> wrote:

Greg,

As you had directed, FMC is providing a weekly report, pursuant to the RCRA Pond UAO, describing field activities conducted pursuant to work plans you have approved.

Work Performed this week

- Continued 12/7 of one GES unit extracting gas from the east perimeter standpipe at Ponds 18A pursuant to the approved IWP.
- Continued continuous monitoring at three Pond 18A boundary locations during periods of gas extraction. There were no TWA or maximum values above the thresholds specified in the Air Monitoring Plan. A spreadsheet summarizing the results of this monitoring to date is attached.
- Monitoring performed pursuant to the approved work plans during this reporting period:
 - Pond 9E - Cap perimeter surface scan
 - Phase IV Ponds - Cap perimeter surface scan
 - Pond 15S - Cap perimeter surface scan
 - Pond 17 - Cap perimeter surface scan

Problems Encountered:

None.

Unplanned Events Encountered:

A brief power short outage occurred on 8/25/13 at about 11:30 pm when a thunderstorm passed through the area. Auto-dialer notified a pond operator who responded to the site and re-started the fresh air flow through the GES unit at 18A, without issue.

Work to be performed the following week:

- Continue implementation of the IWP and 12/7 operation of one GES unit at the east perimeter standpipe on Pond 18A.
- Continue continuous monitoring at three Pond 18A boundary locations during periods of gas extraction.
- Other than continuous monitoring during periods of gas extraction at Ponds 18A, no monitoring is scheduled or required pursuant to the approved work plans for next week.
- Begin compilation of August monitoring data for submittal in monthly report 9/4/13 and review in conference call scheduled for Monday, 9/9/13 at 9A PDT/10A MDT/noon EDT.

<RCRA Pond Continuous PH3 Monitoring_8.25.13.xlsx>